

**Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services**

**STATEMENT OF BASIS**

**Gulf South Pipeline Co LP  
Gulf South Pipeline Co LP - Olla Compressor Station  
Olla, LaSalle Parish, Louisiana  
Agency Interest Number: 8097  
Activity Number: PER20090001  
Proposed Permit Number: 1680-00012-V2**

**I. APPLICANT**

**Company:**

Gulf South Pipeline Co LP  
PO Box 838  
Olla, Louisiana 71465-0838

**Facility:**

Olla Compressor Station  
190 Turbine Rd  
Olla, LaSalle Parish, Louisiana

Latitude        31 Deg    52 Min    21 Sec    60 Hundredths  
Longitude      92 Deg    15Min    37 Sec    10 Hundredths

**II. FACILITY AND CURRENT PERMIT STATUS**

United Gas Pipe Line Company owned and operated the Olla Compressor Station, a natural gas compression facility. The gas turbines were installed in 1964. Mid-Con Exploration Company purchased the facility in 1985, and then Occidental Petroleum Corporation bought the facility in 1986. Koch Industries, Inc. acquired the facility in 1993. The facility changed ownership to Gulf South Pipeline Company, LP on April 30, 2001. The Olla Compressor Station is located approximately 2 miles southwest of Olla, just north of Highway 165. The Olla Compressor Station currently operates under Permit No. 1680-00012-V1, issued October 13, 2004 and the Administrative Amendment, Permit No. 1680-00012-V1, issued on October 20, 2004.

Gulf South Pipeline Co LP - Olla Compressor Station is a designated Part 70 source. The Part 70 permit has been issued to the operating unit within the LaSalle is the following:

<b>Permit No.</b>	<b>Unit or Source</b>	<b>Date Issued</b>
1680-00012-V1	Olla Compressor Station	10/13/2004

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### **III. PROPOSED PROJECT/PERMIT INFORMATION**

#### **Application**

A permit application dated April 1, 2009, was submitted requesting a Part 70 operating permit renewal/modification.

#### **Project**

Gulf South Pipeline Co LP requested a renewal/modification of the Part 70 Operating Permit No. 1680-00012-V1 as required by Louisiana Administrative Code (LAC) 33:III.507.E.

In this renewal/modification, Gulf South Pipeline Company requested to update emissions for EQT007 (Condensate Loading) and add acetaldehyde, acrolein, benzene, toluene and xylene emissions for turbine engines (EQT001 and EQT002).

#### **Proposed Permit**

Permit 1680-00012-V2 will be the renewal/modification Part 70 operating permit 1680-00012-V1 for Olla Compressor Station.

#### **Permitted Air Emissions**

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM <sub>10</sub>	5.01	5.01	-
CO	56.04	56.04	-
SO <sub>2</sub>	2.30	2.30	-
NO <sub>x</sub>	219.32	219.32	-
VOC	16.04	15.16	-0.88

### **IV. REGULATORY ANALYSIS**

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

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**Applicability and Exemptions of Selected Subject Items**

ID No.	Requirement	Note
EQT 1 & 2	NSPS Subpart GG - Standards of Performance for Stationary Gas Turbines [40 CFR 60.110]	DOES NOT APPLY. Turbine was constructed prior to 10/3/77.
	LAC 33:III.Chapter 15 Emission Standards for Sulfur Dioxide	DOES NOT APPLY as per LAC 33.III.1502.A.3, SO <sub>2</sub> < 5 TPY
EQT 3 & 4	LAC 33:III.Chapter 15 Emission Standards for Sulfur Dioxide	DOES NOT APPLY as per LAC 33.III.1502.A.3, SO <sub>2</sub> < 5 TPY
EQT 6	Control of Emission of Organic Compounds Storage of Volatile Compounds [LAC 33:III.2103.G]	EXEMPT. Tank storage capacity is less than 420,000 gallons and is not located in the parishes of Ascension, Calcasieu, East Baton rouge, Iberville, Livingston, Points Coupee, or West Baton Rouge.
	NSPS Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984	DOES NOT APPLY. Tank is less than 10,000 gallons.
EQT 7	Control of Emission of Organic Compounds Volatile Organic Compounds – Loading [LAC 33:III.2107.F]	EXEMPT. This section does not apply to crude or condensate loading facilities.
EQT 8	Control of Emissions of Organic Compounds Oil/Water – Separation [LAC 33:III.2109.B.3]	EXEMPT. Separator separates materials having a true vapor pressure of volatile organic compounds less than 0.5 psia.

**Prevention of Significant Deterioration/Nonattainment Review**

There are no net emission increases of PSD applicable compounds above the significance level. Therefore, this project is exempted from PSD review.

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**Streamlined Equipment Leak Monitoring Program**

This permit does not include a streamlined equipment leak monitoring program.

**MACT Requirements**

The Olla Compressor Station is a minor source of TAP/HAP. MACT is not required.

**Air Quality Analysis**

Emissions associated with the proposed facility were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

Dispersion Model(s) Used: <None>

**General Condition XVII Activities**

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

**Insignificant Activities**

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

**V. PERMIT SHIELD**

This permit does not include a permit shield.

**VI. PERIODIC MONITORING**

NO<sub>x</sub> and CO emissions from the turbines are periodically tested using methods specified in 40 CFR 60 Appendix A.

**VII. GLOSSARY**

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission

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reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

**Hydrogen Sulfide (H<sub>2</sub>S)** – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

**New Source Review (NSR)** – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C (“Prevention of Significant Deterioration of Air Quality”) and D (“Nonattainment New Source Review”).

**Nitrogen Oxides (NO<sub>x</sub>)** – Compounds whose molecules consist of nitrogen and oxygen.

**Organic Compound** – Any compound of carbon and another element. Examples: Methane (CH<sub>4</sub>), Ethane (C<sub>2</sub>H<sub>6</sub>), Carbon Disulfide (CS<sub>2</sub>)

**Part 70 Operating Permit** – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit:  $\geq 10$  tons per year of any toxic air pollutant;  $\geq 25$  tons of total toxic air pollutants; and  $\geq 100$  tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

**PM<sub>10</sub>** – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

**Potential to Emit (PTE)** – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

**Prevention of Significant Deterioration (PSD)** – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

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Sulfur Dioxide (SO<sub>2</sub>) – An oxide of sulfur.

Sulfuric Acid (H<sub>2</sub>SO<sub>4</sub>) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.